

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA	:	1:24CR____-1
	:	
v.	:	
	:	
LATOYA KEISHA BULLOCK	:	

FACTUAL BASIS FOR A GUILTY PLEA

NOW COMES the United States of America, by and through Sandra J. Hairston, United States Attorney for the Middle District of North Carolina, and states that the factual basis for a guilty plea is as follows:

1. The September 11th Victims' Compensation Fund

The September 11th Victims' Compensation Fund (VCF) provides compensation to individuals, or representatives of deceased individuals, who were present at the World Trade Center crash site (or surrounding New York exposure zone), the Pentagon crash site, and the Shanksville, Pennsylvania crash site between September 11, 2001 and May 30, 2002, and who had since been diagnosed with a 9/11-related illness. The surrounding New York exposure zone is depicted below:



In order to apply for compensation from the VCF, applicants had to register with the VCF, provide certification from the World Trade Center (WTC) Health Program confirming a physical condition, and file a claim with supporting documentation.

The WTC Health Program certification provided for three tiers of exposure, one of which, Tier One, covered the following activity: “Worked or volunteered, and/or attended school/daycare in heavily dust-contaminated areas or in areas in the path of heavy smoke plumes.”

Supporting documentation could include:

- a. A Victim Presence Statement, wherein the victim/claimant certifies under penalty of perjury that he/she was at an eligible location between September 11, 2001 and May 30, 2002.
- b. A Witness Presence Statement, wherein a person who witnessed the victim/claimant at an eligible location between September 11, 2001 and May 30, 2002 certifies as much under penalty of perjury.

In order to apply for compensation from the VCF, applicants also had to certify as to the following:

I certify that the information provided in this application and any documents provided in support of this claim are true and accurate to the best of my knowledge, and I declare under penalty of perjury that the forgoing is true and correct. I understand that false statements made in connection with the application may result in fines, imprisonment and/or any other remedy available by law to the Federal Government, including as provided in 18 U.S.C. § 1001, and that claims that appear to be potentially fraudulent or to contain false information will be forwarded to federal, state, and local law enforcement authorities for possible investigation and prosecution.

2. Pierre France Dominique's VCF Application

On September 11, 2001, Pierre France Dominique was thirteen years old. On December 5, 2019, from Guilford County in North Carolina, the defendant, LaToya Keisha Bullock, submitted via facsimile an application for

VCF compensation on behalf of Dominique, based on his purported presence in the New York exposure zone from September 12, 2001 until April of 2002.

In support of his application for VCF compensation, Dominique made the following representations under penalty of perjury:

- a. He stated that he joined the American Red Cross on September 12, 2001 and served until September 1, 2002 (despite stating in a separate, handwritten communication to the VCF that he served from September 12, 2001 until April of 2002);
- b. He stated that on September 11, 2001, he was attending Leadership and Public Service High School located at 90 Trinity Place in Manhattan;¹ and
- c. He stated that he dropped out of high school in October 2001 and volunteered full-time until September 2002.

In or around June of 2021, Dominique supplemented his application with the letter below, purportedly from “Jennifer Walsh” with the American Red Cross:

¹ Dominique later represented to the VCF that he attended the High School of Economics and Finance, located at 6 World Trade Center on Trinity Place in Manhattan. Both of these addresses are within the New York exposure zone.

VCF # 0152859

Greater New York Region



October 1, 2002
Pierre Dominique
428 Beach 47th Street
Far Rockaway, NY 11691

Dear Pierre Dominique,

We would like to take this opportunity to thank you for your response to the 9/11 Disaster, one of the greatest challenges our volunteer-led American Red Cross Youth has ever faced. You and many others answered the call and selflessly came from every corner of our region to help out. Thank you for your duties between September 12, 2001 – September 1, 2002 with helping to clean and maintain the Emergency Response Vehicles and offering translator services to those who needed it after the 9/11 Disaster.

Whenever we ask our American Red Cross Youth volunteers for help, we get it. Each year, on average, the American Red Cross provides services in over 62,000 emergencies in various places around the United States. Whether flood, fires, earthquakes, hurricanes, or man-made disasters, the American Red cross is there to respond. As our corporate slogan states "Together, we can save a life."

We are grateful that you chose to volunteer with the American Red Cross as your way to contribute to those in need.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Walsh", with a long horizontal flourish extending to the right.

Jennifer Walsh
Disaster Services

When the VCF contacted the American Red Cross, however, they had no record of Dominique's service.

After the VCF denied Dominique's application for various inconsistencies on August 23, 2021, he appealed the denial and submitted one

Witness Presence Statement purportedly from his father, R.D., and three Witness Presence Statements purportedly from S.H.,² verifying his presence in the New York exposure zone on September 11, 2001, and his return thereafter to perform volunteer work on behalf of the American Red Cross.

After the VCF denied Dominique's appeal on October 27, 2021, he worked with his partner, Bullock, to submit additional fraudulent documents in May of 2022 to support his claim. This included a letter, claiming to be from an administrative assistant named "Kim Cole" at the High School of Economics and Finance, verifying a transcript purportedly issued by the school, as well as Dominique's attendance at the school. The VCF attempted to contact Kim Cole at the number given; a woman answered and indicated that it was the wrong number. After advising Pierre that they could not verify the letter or the transcripts, Pierre provided another contact for the school, "LaToya Smith," and a contact number for her.

Agents were unable to contact LaToya Smith at the number provided – 914/xxx-5704. On August 19, 2022 at 1:51pm, Pierre called the VCF to ask about the status of his claim. The caller ID for this call displayed the name "B

² Each document from S.H. identified her as a "close friend." In March 2022, after Dominique's initial claim was denied, S.H. purportedly submitted a fourth document in support of Pierre's application, wherein she identified herself as his stepmother. The signatures of the various documents were inconsistent.

Toya.” The VCF advised Pierre they had not been able to reach LaToya Smith. Pierre said that he would have Smith call the VCF. On August 19, 2022 at 2:12pm (that is, twenty-one minutes after the first call), a “LaToya Smith” called the VCF from 914/xxx-5740. The caller ID for the call again displayed the name “B Toya.” “Smith” stated that she was an administrative assistant at the high school from 1999 through 2003 and could verify Pierre as a student there as of September 11, 2001.

The VCF questioned “Smith” regarding other personnel at the school; she could not provide the name of the principal or a single member of the office staff. The VCF then interviewed Steven Squillante, the assistant principal at the high school, who had been employed there for eighteen years. Squillante did not know a “Kim Cole” or a “LaToya Smith” and confirmed that the transcript Pierre submitted purporting to be from the school did not, in fact, come from the High School of Economics and Finance. He noted that while Cole identified herself as an “administrative assistant,” they did not use that title, and while Cole provided a Gmail email address as her contact email, school employees would not provide personal email addresses in such a manner. He also noted that the names of the classes listed did not track their titles at the school, and that two classes were listed as ninth grade classes that the school only offered as eleventh grade classes.

Notably, despite Pierre's representations in his VCF application that he dropped out of school shortly after September 11, 2001, the transcript he provided indicated that he completed his full ninth grade year at the high school (with a GPA of 3.3). Database checks confirmed that the phone number Pierre provided for "LaToya Smith" was associated with the defendant.

3. *DOJ-OIG separately interviews Dominique and his father, R.D.*

On September 21, 2022, agents with the Department of Justice – Office of Inspector General (DOJ-OIG) interviewed Dominique in Greensboro. The interview was recorded and transcribed. He represented the following:

- a. Regarding the ARC: Pierre did not know who Jennifer Walsh was, until agents told him that she signed his letter from the American Red Cross. Pierre then remembered her. He first stated that Walsh mailed the letter to his house, but later stated that he met her in person at "some Red Cross building in Manhattan," where she went onto her computer, signed it, and gave it to him in person.
- b. Regarding the High School of Economics and Finance: Pierre did not recognize the name Michael Stanzione, who is the principal there and has been at the high school since 2000. Pierre said that he attended the high school for a week and then never went back after 9/11. Pierre could not remember the name of any teachers there, but did remember one of the "admission ladies," LaToya Smith. He provided the names of three friends who attend the school with him; the VCF confirmed that the school had no record of any of those people attending the school.

- c. Regarding a letter from Briana Johnson, an old friend of his from New York, submitted to the VCF to support his claim (which was notarized by the defendant): Pierre first said that he messaged Johnson over Facebook to obtain the letter. He then stated that Johnson mailed the letter to him because she lived in New York, and he lived in North Carolina. When asked how LaToya Bullock notarized the letter if Johnson was in New York, he said that he held onto the letter until he traveled to New York, with Bullock, and that Johnson signed the letter then.

Investigators interviewed R.D. on October 22, 2022 in High Point, who made the following representations:

- a. R.D. first stated that he was with his girlfriend, S.H., and Dominique at a residence in Brooklyn on the evening of September 11, 2001, and that they stayed there for five days together before R.D. volunteered to perform volunteer work for the American Red Cross in the New York exposure zone;
- b. R.D. later stated that he moved to North Carolina in April of 2016 and that he met S.H. at some time after that move;
- c. R.D. stated that he performed volunteer work with for the American Red Cross in the New York exposure zone following September 11, 2001, but that Dominique was not with him when he did so;
- d. R.D. stated Dominique attended Erasmus High School in Brooklyn for his ninth and tenth grade years prior to dropping out; and

- e. R.D. later stated that PIERRE FRANCE DOMINIQUE must have transferred to the High School of Economics and Finance from Erasmus High School prior to September 11, 2001.

Four days after this interview, R.D. called the interviewing agent and recanted these statements. R.D. further admitted that: Dominique “made the entire thing up”; Dominique never attended the High School of Economics and Finance; Dominique never performed volunteer work for the American Red Cross; Dominique and R.D. were not with S.H. on September 11, 2001; and Dominique fabricated the Witness Presence Statements purportedly completed by R.D. and S.H.

4. *Forensic evidence*

Bullock worked as a tax auditor for the North Carolina Department of Revenue (DOR), which provided information to DOJ-OIG as a part of its investigation. Specifically, they provided an email, dated April 15, 2022, that haitianprince718@gmail.com³ sent to latoya.bullock@ncdor.gov at 12:53 pm. The email contained an attachment that was a .gif file of the “High School of Economics and Finance” logo. Twenty-one minutes later, the Bullock email address sent Dominique’s email address a Microsoft Word file entitled “Letter

³ Dominique used this email address to register his VCF claim.

head.docx” that was an unsigned version of the letter sent to the VCF on May 22, 2022. The file’s properties indicated that Bullock created the document at 12:54 pm.

DOR records also showed that Bullock listed the 914/xxx-5740 telephone number on her employment forms, the same number used to call the VCF on August 19, 2022, when “LaToya Smith” vouched for Pierre’s attendance at the High School of Economics and Finance.

Investigators also seized, pursuant to a federal warrant, a personal laptop from Dominique and Bullock’s home in Greensboro, North Carolina. A forensic examiner determined that between July 2021 and October 2023, the following Google searches were performed on it:

- a. High School of Economics and Finance Letterhead
- b. High School for Leadership and Public Service
- c. Fillable high school transcript template
- d. High school transcript template
- e. High schools near the world trade center that used to exist
- f. NYC great red cross
- g. Check cashings near WTC during 911
- h. 8 high schools near the WTC that use [sic] to exist

The investigator also located a Microsoft Word version of the American Red Cross letter Dominique submitted in support of his application; the

metadata for the document indicated that the defendant created it on January 15, 2020.

This the 6th day of February, 2024.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2024, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel of record.

Respectfully submitted,

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